

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
and OPENAI HOLDINGS, LLC,

Defendants.

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No. 1:23-cv-11195-SHS

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No. 1:24-cv-03285-SHS

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DAILY NEWS, LP; CHICAGO TRIBUNE  
COMPANY, LLC; ORLANDO SENTINEL  
COMMUNICATIONS COMPANY, LLC; SUN-  
SENTINEL COMPANY, LLC; SAN JOSE  
MERCURY-NEWS, LLC; DP MEDIA  
NETWORK, LLC; ORB PUBLISHING, LLC;  
AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
and OPENAI HOLDINGS, LLC,

Defendants.

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**AFFIDAVIT OF CAROLYN HOMER IN SUPPORT OF MOTION FOR ADMISSION *PRO***  
***HAC VICE***

I, Carolyn M. Homer, declare as follows:

1. I am an attorney at law licensed to practice in Washington, the District of Columbia. I submit this Affidavit in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent Defendants OpenAI Inc., OpenAI LP, OpenAI GP

LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, in the above-captioned action.

2. I am a member in good standing of the bar of the state of California and the bar of the District of Columbia. A true copy of my certificate of good standing issued by the Bar of the State of California as well as a true copy of my certificate of good standing issued by the Bar of the District of Columbia within the past 30 days is attached hereto:

3. Pursuant to Local Rule 1.3(c), I state:

a. I have never been convicted of a felony:

b. I have never been censured, suspended, disbarred or denied admission or readmission by any court: and

4. There are no disciplinary proceedings presently against me; and

5. I have read and am familiar with the provisions of the Judicial Code (Title 28 U.S.C.), the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and the New York Rules of Professional Conduct. I will faithfully adhere to all rules applicable to conduct in connection with any activities in this Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

RESPECTFULLY SUBMITTED,

District of Columbia  
Signed and sworn to (or affirmed) before me  
on 10/25/24 by Carolyn Homer  
(Date) Name(s) of Individual(s) Making Statement  
Signature of Notarial Officer: Junata Legros  
Title of Office: Notary Public  
My Commission Expires: 09/30/2027

Carolyn Homer

